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Attorneys for Defendants

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

PATRICIA FORTLAGE,

Plaintiff,

vs.

HELLER EHRMAN, LLP; HELLER
EHRMAN LONG-TERM DISABILITY
PLAN, and UNUM LIFE INSURANCE CO.
OF AMERICA

Defendants.

Case No. C 08-03406 SBA (DMR)

**STIPULATED REQUEST FOR ORDER
CHANGING TIME AND PROPOSED
ORDER (L.R. 6-2, 7-12)**

The Honorable Donna M. Ryu

Plaintiff Patricia Fortlage and Defendants Heller Ehrman Long Term Disability Plan and Unum Life Insurance Company of America hereby request that the telephonic hearing set by the Court in the above-captioned action be continued from April 29, 2011 to May 6, 2011. The parties further request that the deadline for submitting a joint letter to the Court be continued from April 26, 2011 to May 3, 2011. Good cause exists for this Stipulated

1 Request in that, as set forth in the Declaration of Horace W. Green submitted concurrently
2 herewith, counsel for Defendants has a scheduling conflict and will be out of town on those
3 dates.

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5 DATE: April 20, 2010

LAW OFFICE OF GEOFFREY V. WHITE

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7 By: /s/ Geoffrey V. White
8 GEOFFREY V. WHITE
Attorney for Plaintiff

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10 DATE: April 20, 2010

GREEN & HUMBERT

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12 By: /s/ Horace W. Green
13 HORACE W. GREEN
Attorneys for Defendants

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16 **ORDER**

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18 Having reviewed the Stipulated Request for Order Changing Time and the
19 Declaration of Horace W. Green submitted in support thereof, and good cause appearing,

20 **IT IS HEREBY ORDERED** that the parties shall submit a joint letter addressing
21 Defendant Unum Life Insurance Company's argument that no discovery has been
22 permissible in this case to date by no later than May 3, 2011. The joint letter may not
23 exceed five pages total and shall not include exhibits.

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25 **IT IS FURTHER ORDERED** that the parties shall participate in a telephonic
26 conference with the Court regarding the subject of the joint letter on May 6, 2011 at **10:30**
27 **a.m.** Counsel for Plaintiff shall initiate the three-way conference call to the Court as
28

1 follows: (1) by first calling counsel for Defendant Unum Life Insurance Co. of America; and
2 then (2) with all counsel on the line, calling the Court's call-in number, five minutes prior to
3 the scheduled start time.

4 In all other respects, the Court's April 19, 2011 Notice and Order remains in effect.
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8 Dated: April 21, 2011

9 DONNA M. RYU
10 United States Magistrate Judge
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